

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

GEORGE BOYD, et al.,
Individually and on behalf of
all others similarly situated,

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Plaintiff,

*

v.

* Civil Action No: 3:12-cv-700-REP

*

**LAW OFFICES OF
SHAPIRO, BROWN & ALT, LLP, et al.,**

*

*

Defendants.

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DECLARATION OF SUSAN MEYER

I, Susan Meyer, declare under penalty of perjury, on this 20th day of December, 2012, that I have personal knowledge of the following matters and that they are true and correct to the best of my knowledge:

1. My name is Susan Meyer. I am a resident of Chesapeake, Virginia. I am above the age of eighteen and am competent to testify to all matters contained herein.

2. I am currently employed by Shapiro, Brown & Alt, LLP (“SBA”), which is a law firm that practices primarily in the area of foreclosure.

3. I am familiar with the facts of the instant litigation between Plaintiffs, SBA and Professional Foreclosure Corporation (“PFC”) and have reviewed the Complaint.

4. As I understand it, the Complaint filed in this case makes allegations that the institutional practices of SBA and PFC are non-compliant with the FDCPA and Virginia state law. These claims include allegations that that correspondence sent by SBA and PFC to borrowers violated the FDCPA and Virginia law. I have first-hand knowledge concerning these claims as well as the defenses of SBA and PFC.

5. To the best of my knowledge, all correspondence to borrowers was sent from either Virginia Beach, Virginia, Prince William County, Virginia or Fairfax County, Virginia.

6. From 2005 through 2012, during the time frames alleged in the Complaint, I was employed by SBA in the Virginia Beach office, and at all relevant times since the filing of the Complaint, was an officer of PFC.

7. My job responsibilities as they relate to the allegations of the Complaint include reviewing foreclosure documents executed by clients necessary for the foreclosure process, along with title work, sale notices, advertisements, FDCPA letters and attorney correspondence related to particular files.

8. The continued litigation of this case in the Richmond Division would create great hardships and inconveniences for me.

9. My work hours generally are 8:45 a.m. to 5:30 p.m. each weekday, with occasional Saturday work and evening working from home via laptop computer. My presale work in foreclosure has significant deadlines with regard to sending sale notices and placing advertisements, in order to ensure valid sales. My office time is highly demanding with regard to meeting all deadlines on a daily basis. In addition I attend local foreclosure sales, local court hearings and am required, on a daily basis, to be on the telephone with individuals involved in foreclosure sales. These job responsibilities make it difficult for me to leave the office in the middle of a work day.

10. In addition, I have a school-aged child. Because my husband drives a tractor-trailer over the road, I am the only parent available in emergency situations and am solely responsible for getting my child to school and home again in the evenings.

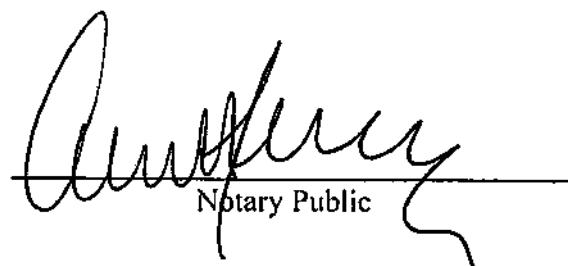
11. It will be extremely inconvenient and create undue hardship for me to leave my home and current job to travel to Richmond to attend pretrial and trial proceedings in this case.



Susan Meyer

COMMONWEALTH OF VIRGINIA,
CITY OF VIRGINIA BEACH, to wit:

The above Declaration was subscribed and sworn to (or affirmed) before me on this _____ day of December, 2012, by Susan Meyer, proved to me on the basis of satisfactory evidence to be the person who appeared before me.



Amanda Fernandez
Notary Public

My Commission Expires: 11/30/15

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